

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION**

This Document Relates To:

THE DEALERSHIP CLASS ACTION

MDL No. 2817

Case No. 18-cv-00864

Hon. Robert M. Dow, Jr.

Magistrate Judge Jeffrey T. Gilbert

**DECLARATION OF PEGGY J. WEDGWORTH IN OPPOSITION TO
DEFENDANT CDK GLOBAL, LLC'S MOTION TO EXCLUDE
THE OPINIONS AND PROFERRED TESTIMONY OF DR. MICHAEL A. WILLIAMS**

I, Peggy J. Wedgworth, Esq., pursuant to 28 U.S.C. § 1746, hereby declare:

1. I am a partner at Milberg Phillips Grossman LLP, and I represent Dealership Class Plaintiffs, as Dealership Interim Lead Class Counsel and MDL Co-Lead Counsel, in the above-captioned matter. I respectfully submit this declaration in opposition to Defendant CDK Global, LLC's Motion to Exclude the Opinions and Proffered Testimony of Dr. Michael A. Williams.

2. I have personal knowledge of the matters set forth herein, and could and would testify competently thereto if called upon to do so.

3. Attached hereto as Exhibit A is a true and correct copy of selected excerpts from the transcript of First Day of Evidentiary Hearing, Morning Session (Jun. 26, 2017), ECF No. 164, *Authenticom, Inc. v. CDK Global, LLC*, Case No. 3:17-CV-318-JDP (W.D. Wisc.).

4. Attached hereto as Exhibit B is a true and correct copy of selected excerpts from the transcript of the Deposition of Steven M. Cottrell, dated Apr. 2, 2019.

5. Attached hereto as Exhibit C is a true and correct copy of the Declaration of Howard Gardner, dated June 16, 2017, ECF No. 93, *Authenticom, Inc. v. CDK Global, LLC*, Case No. 3:17-

CV-318-JDP (W.D. Wisc.).

6. Attached hereto as Exhibit D is a true and correct copy of selected excerpts from the transcript of the Deposition of Michael A. Williams, Ph.D., dated Nov. 8, 2019.

7. Attached hereto as Exhibit E is a true and correct copy of the Expert Report of Michael D. Whinston, Ph.D., dated Nov. 15, 2019.

8. Attached hereto as Exhibit F is a true and correct copy of selected excerpts from the transcript of the Deposition of Michael D. Whinston, Ph.D., dated Jan. 10, 2020.

9. Attached hereto as Exhibit G is a true and correct copy of selected excerpts from Joshua D. Angrist & Jorn-Steffen Pischke, *MOSTLY HARMLESS ECONOMETRICS: AN EMPIRICIST'S COMPANION* (1st ed., Princeton Univ. Press 2009).

10. Attached hereto as Exhibit H is a true and correct copy of Jorn-Steffen Pischke, *The Impact of Length of the School Year on Student Performance and Earnings: Evidence From the German Short School Years*, *ECONOMIC JOURNAL*, vol. 117, issue 523.

11. Attached hereto as Exhibit I is a true and correct copy of Atheendar S. Venkataramani, *et al.*, *Association Between Automotive Assembly Plant Closures and Opioid Overdose Mortality in the United States, A Difference-in-Differences Analysis*, *JAMA INTERNAL MEDICINE*, vol. 180, No. 2 (2020).

12. Attached hereto as Exhibit J is a true and correct copy of Fernando M. Aragón & Juan P. Rud, *Natural Resources and Local Communities: Evidence from a Peruvian Gold Mine*, *AMERICAN ECONOMIC JOURNAL: ECONOMIC POLICY*, vol. 5 (May 2013).

13. Attached hereto as Exhibit K is a true and correct copy of Matthew J. Slaughter, *Trade liberalization and per capita income convergence: a difference-in-differences analysis*, *JOURNAL OF INT'L ECONOMICS*, vol. 55, Issue 1 (2001).

14. Attached hereto as Exhibit L is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0787969 to 970.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Birmingham, Alabama, this 29th day of May, 2020.

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth

CERTIFICATE OF SERVICE

I, Peggy J. Wedgworth, an attorney, hereby certify that on May 29, 2020, I caused a true and correct copy of the foregoing **DECLARATION OF PEGGY J. WEDGWORTH IN OPPOSITION TO DEFENDANT CDK GLOBAL, LLC'S MOTION TO EXCLUDE THE OPINIONS AND PROFERRED TESTIMONY OF DR. MICHAEL A. WILLIAMS** to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth